

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA**

GEORGE MEEHAN, Individually and on behalf of all others similarly situated,

Plaintiff,

v.

VERIZON COMMUNICATIONS, INC.,
HANS VESTBERG and MATTHEW ELLIS,

Defendants.

Case No: 2:23-cv-01375-NR

**NOTICE OF VOLUNTARY DISMISSAL
WITHOUT PREJUDICE PURSUANT
TO FED. R. CIV. P. 41**

PLEASE TAKE NOTICE that Plaintiff George Meehan (“Plaintiff”) files this notice of voluntary dismissal pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i). Defendants have not filed an answer or moved for summary judgment. A class has not been certified. Plaintiff has not previously dismissed an action based on or including the same claims as presented in this instant action.

Furthermore, there is a substantially similar action proceeding and pending against the same defendants in the United States District Court for the District of New Jersey styled as *General Retirement System of the City of Detroit v. Verizon Communications Inc., et al.*, 3:23-cv-05218-RK-RLS (the “New Jersey Action”). The New Jersey Action asserts claims under Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 and Rule 10b-5 promulgated thereunder, arising from the same conduct as the instant action.

This dismissal is without prejudice. Each party is to bear their own costs and fees.

Dated: October 9, 2023

Respectfully submitted,

**LAW OFFICE OF LEON AUSSPRUNG MD,
LLC**

/s/ James E. Hockenberry

James E. Hockenberry (P.A. I.D. 91133)
1800 John F. Kennedy Boulevard, Suite 1500
Philadelphia, PA 19103
Telephone: (215) 717-0744
Email: JH@aussprunglaw.com

Liaison Counsel

THE ROSEN LAW FIRM, P.A.

Phillip Kim, Esq.
275 Madison Avenue, 40th Floor
New York, New York 10016
Telephone: (212) 686-1060
Fax: (212) 202-3827
Email: pkim@rosenlegal.com

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on October 9, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such to all CM/ECF participants.

Dated: October 9, 2023

/s/ James E. Hockenberry
James E. Hockenberry